

# TAYLOR & COHEN LLP

305 Broadway, 7th Floor  
New York, NY 10007  
Tel (212) 257-1900  
Fax (646) 808-0966  
www.taylorcohenllp.com

September 17, 2021

*By ECF and email*

The Honorable Katherine Polk Failla  
United States District Judge  
United States District Court  
40 Foley Square, Room 2103  
New York, NY 10007

**MEMO ENDORSED**

**Re: U.S. v. Gregoris Martinez, 19 CR 690-KPF – Motion to Modify Bail Conditions**

Dear Judge Failla:

I represent Gregoris Martinez in the above-referenced matter. I am writing to respectfully request that the Court delay Mr. Martinez's surrender date by one month, to November 1, 2021. Mr. Martinez has been designated to FCI Fort Dix, and his current surrender date is October 1, 2021.

As the Court may recall, Mr. Martinez has a number of medical issues that required additional testing at the time of his sentencing. These issues included abnormalities in his blood work and a cyst on his liver. A follow-up MRI was scheduled after his sentencing; however, Mr. Martinez's insurance denied coverage and the test was cancelled. Mr. Martinez's healthcare provider, Williamsburg Community Healthcare Center, has proposed an ultrasound as an alternative to the MRI. That test and insurance approval cannot be arranged before Mr. Martinez's currently scheduled surrender date. Additionally, as reported in his PSR, Mr. Martinez has experienced breathing issues (which may be a long-term effect from COVID). He has scheduled an appointment with a pulmonologist on October 5, 2021.

Accordingly, we are requesting a one-month extension of Mr. Martinez's surrender date so that he can get an ultrasound (if approved by his insurance) and consult with a pulmonologist.

The government consents to this request.

Respectfully,



Zachary S. Taylor

cc: Aline Flodr, Esq. (*by ECF and email*)

Application GRANTED. Mr. Martinez's surrender date shall be modified to November 1, 2021.

SO ORDERED.

Date: September 20, 2021  
New York, New York



HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE